

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL TWO)

Docket No. RM2021-4

MOTION OF THE UNITED STATES POSTAL SERVICE FOR
LEAVE TO FILE REPLY COMMENTS REGARDING PROPOSAL TWO
(May 25, 2021)

Order No. 5852 (March 26, 2021) established the procedural schedule in this proceeding and, while setting the date for initial comments at May 14, made no provision for reply comments. Pursuant to Order No. 5852, four sets of initial comments were filed on May 14, and those were submitted by the Public Representative (PR), the Association for Postal Commerce (PostCom), Pitney Bowes (PB), and an aggregation of trade associations – National Postal Policy Council, Major Mailers Association, National Association of Presort Mailers, and the Associations for Mail Electronic Enhancement (NPPC). All four sets of comments make arguments against at least one aspect of Proposal Two. The Postal Service requests leave to file reply comments addressing those arguments.

Acceptance of those reply comments would enhance the Commission's ability to evaluate the claims advanced in those initial Comments, and thus create a more complete record for consideration of the Proposal. The Postal Service would otherwise have no opportunity to respond to those comments, or to address the alleged deficiencies in Proposal Two. The Postal Service reply comments are proffered in a separate pleading submitted concurrently.

Wherefore, the Postal Service respectfully requests leave to file reply comments responding to the initial comments filed in the proceeding.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260-1137
eric.p.koetting@usps.gov
(202) 277-6333
May 25, 2021